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*Attorneys for HASElect-Medical Receivables
Litigation Finance Fund International SP*

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

INFINITY CAPITAL MANAGEMENT, INC.

Debtor.

Case No. 21-14486-abl

Chapter 7

HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND
INTERNATIONAL SP,

Plaintiff,

v.

TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP,

Defendant.

Adversary Case No. 21-01167-abl

**NOTICE OF HEARING ON
HASELECT-MEDICAL
RECEIVABLES LITIGATION
FINANCE FUND
INTERNATIONAL SP'S
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP,

Counter-Plaintiff,

v.

HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND
INTERNATIONAL SP; ROBERT E. ATKINSON,
CHAPTER 7 TRUSTEE

Counter-Defendants.

Hearing Date: May 12, 2022

Hearing Time: 9:30 a.m.

1 ROBERT E. ATKINSON, CHAPTER 7
2 TRUSTEE,

3 Counter-Claimant

4 v.

5 TECUMSEH-INFINITY MEDICAL
6 RECEIVABLES FUND, LP,

7 Counter-Defendant

8 **NOTICE OF HEARING ON HASELECT-MEDICAL RECEIVABLES LITIGATION**
9 **FINANCE FUND INTERNATIONAL SP'S**
10 **MOTION FOR PARTIAL SUMMARY JUDGMENT**

11 **NOTICE IS HEREBY GIVEN THAT** Plaintiff/Counter-Defendant HASElect-Medical
12 Receivables Litigation Finance Fund International SP (“HASElect”) filed its *Motion for Partial*
13 *Summary Judgment as to Certain Disputed Receivables* (the “Motion”) on March 22, 2022. The
14 Motion seeks the entry of an order determining the superior priority of HASElect’s perfected
15 security interest in certain of the accounts receivable that Tecumseh-Infinity Medical Receivables
16 Fund, LP (“Tecumseh”) claims to have acquired from Debtor Infinity Capital Management, Inc.
17 (“Infinity” or “Debtor”).

18 **NOTICE IS FURTHER GIVEN** that a hearing on the Motion will be held before a United
19 States Bankruptcy Court Judge on **May 12, 2022 at 9:30 a.m.** at the U.S. Bankruptcy Court for
20 the District of Nevada in the Foley Federal Building, 300 Las Vegas Blvd. South, Las Vegas,
21 Nevada 89101. Dial-in information can be located on the U.S. Bankruptcy Court for the District
22 of Nevada’s website.

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NOTICE IS FURTHER GIVEN that any opposition to the Motion and the relief requested therein must be filed and served in accordance with Local Rule 9014(d)(1), which provides:

If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

- The court may *refuse to allow you to speak* at the scheduled hearing; and
- The court may rule *against you* without formally calling the matter at the hearing.

PLEASE TAKE FURTHER NOTICE that the hearing on the Motion may be continued from time to time without further notice except for the announcement of any adjourned dates and times at the above-noticed hearing or any adjournment thereof, and the court may approve modifications at the hearing or any continued hearing.

DATED this 22nd day of March 2022.

SHEA LARSEN

/s/ Bart K. Larsen, Esq.

Bart K. Larsen, Esq.

Kyle M. Wyant, Esq.

1731 Village Center Circle, Suite 150
Las Vegas, Nevada 89134

*Attorneys for HASelect-Medical Receivables
Litigation Finance Fund International SP*

CERTIFICATE OF SERVICE

1
2 1. On March 22, 2022, I served the following document(s): **NOTICE OF HEARING ON**
3 **HASELECT-MEDICAL RECEIVABLES LITIGATION FINANCE FUND**
4 **INTERNATIONAL SP'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

5 2. I served the above document(s) by the following means to the persons as listed below:

6 ☒ a. ECF System:

7 CLARISSE L. CRISOSTOMO on behalf of ROBERT E. ATKINSON
8 clarisse@nv-lawfirm.com, bknotices@nv-lawfirm.com

9 GERALD M GORDON on behalf of TECUMSEH-INFINITY MEDICAL
10 RECEIVABLES FUND, LP
11 ggordon@gtg.legal, bknotices@gtg.legal

12 GABRIELLE A. HAMM on behalf of TECUMSEH-INFINITY MEDICAL
13 RECEIVABLES FUND, LP
14 ghamm@Gtg.legal, bknotices@gtg.legal

15 MICHAEL D. NAPOLI on behalf of TECUMSEH-INFINITY MEDICAL
16 RECEIVABLES FUND, LP
17 michael.napoli@akerman.com,
18 cindy.ferguson@akerman.com; catherine.kretzschmar@akerman.com; laura.taveras@akerman.com;
19 an.com;masterdocketlit@akerman.com; teresa.barrera@akerman.com

20 ARIEL E. STERN on behalf of TECUMSEH-INFINITY MEDICAL RECEIVABLES
21 FUND, LP
22 ariel.stern@akerman.com, akermanlas@akerman.com

23 ☐ b. United States mail, postage fully prepaid:

24 ☐ c. Personal Service:

25 I personally delivered the document(s) to the persons at these addresses:

26 ☐ For a party represented by an attorney, delivery was made by handing the
27 document(s) at the attorney's office with a clerk or other person in charge, or if no one is in
28 charge by leaving the document(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handling the document(s) to the party or
by leaving the document(s) at the person's dwelling house or usual place of abode with
someone of suitable age and discretion residing there.

☐ d. By direct email (as opposed to through the ECF System):
Based upon the written agreement of the parties to accept service by email or a court order,
I caused the document(s) to be sent to the persons at the email addresses listed below. I did
not receive, within a reasonable time after the transmission, any electronic message or other
indication that the transmission was unsuccessful.

☐ e. By fax transmission:

Based upon the written agreement of the parties to accept service by fax transmission or a
court order, I faxed the document(s) to the persons at the fax numbers listed below. No

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error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

☐ f. By messenger:

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 22, 2022.

By: /s/ Bart K. Larsen, Esq.